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ATTORNEYS FOR PLAINTIFF DR. RALPH S. BEREN, EDD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DR. RALPH S. BEREN, ED.D,

Plaintiff,

v.

BOARD OF TRUSTEES OF
CALIFORNIA STATE UNIVERSITY,
an Entity of the State of California,
CALIFORNIA STATE UNIVERSITY,
an Entity of the State of California,
JACOB E. PEREA, ED.D, an Individual,
in his Individual and Representative Capacities as
Dean of School of Education of California State
University,
NATHAN T. AVANI, PH.D, an Individual,
in his Individual and Representative Capacities as
Chair of Department of Secondary Education of
California State University,
ELK GROVE UNIFIED SCHOOL DISTRICT,
an Entity of the State of California,
KIMI KANEKO, an Individual,
in her Individual and Representative Capacities as
Program Administrator of Elk Grove Unified School
District,
ELIZABETH KANEKO, an Individual,
in her Individual and Representative Capacities as
Supervisor of Elk Grove Unified School District, and
DOES 1-300,

Defendants.

) No. 3:06-CV-04706-MMC

)
) **STIPULATED ORDER EXTENDING DATE**
) **FOR RESPONSIVE PLEADING FOR ELK**
) **GROVE DEFENDANTS**

1 Plaintiff and appearing defendants Elk Grove Unified School District, Kimi Kaneko, and
2 Elizabeth Kaneko hereby stipulate and agree as follows:
3

- 4 1) Plaintiff and defendants have engaged in a verbal meet and confer about plaintiff's intention
5 to file a first amended complaint,
6 2) Defendants have expressed concerns about some of the causes of action set forth,
7 3) Defendants have agreed to meet and confer with plaintiff in writing by 2006 November 16
8 regarding said concerns,
9 4) Plaintiff shall consider said meet and confer and file his first amended complaint by 2006
10 November 20, and
11 5) Defendants' time to respond is extended accordingly until twenty (20) days after service of
12 the amended complaint.
13

14 SO STIPULATED.

15 Dated: 2006 November 08

/s/Philip Steven Horne, Esq.
Philip Steven Horne, Esq.
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LABOR AND PROPERTY LITIGATION
ATTORNEYS FOR PLAINTIFF BEREN

18 /s/Michael W. Pott, Esq.
19 Michael W. Pott, Esq.
20 PORTER, SCOTT, WEIBERG & DELEHANT
21 ATTORNEYS FOR ELKGROVE DEFENDANTS

22 SO ORDERED.

23 2006 November 16


The Honorable Maxine M. Cheney
JUDGE OF THE UNITED STATES DISTRICT COURT